

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

UNITED STATES OF AMERICA

v.

**MARGARET WARD HEILMAN**

CRIMINAL NO. \_\_\_\_\_

18 U.S.C. § 1349

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 982(a)(2)(A)

28 U.S.C. § 2461(c)

**INFORMATION**

**BACKGROUND**

1. The Defendant, **MARGARET WARD HEILMAN**, is a resident of Florence County, South Carolina.

2. At all times pertinent to this Information, **MARGARET WARD HEILMAN** was an employee of Carolina Insulation Contractors, Inc. (hereinafter “Carolina Insulation”), a business located in Florence County, South Carolina.

3. Carolina Insulation is a family owned and operated business.

**Count 1**  
**(Conspiracy to Commit Wire Fraud)**

**THE UNITED STATES ATTORNEY CHARGES:**

*The Conspiracy*

4. The factual allegations of paragraphs 1 through 4 of this Information are re-alleged as though fully set forth herein.

5. From beginning at least as early as September 2014 through at least May 2023, in the District of South Carolina and elsewhere, the Defendant **MARGARET WARD HEILMAN** and others, both known and unknown to the United States Attorney, knowingly and intentionally

combined, conspired, confederated, agreed, and had a tacit understanding to knowingly devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, in that **MARGARET WARD HEILMAN** and others known and unknown to the United States Attorney, did transmit and cause to be transmitted by means of wire, radio, or television communication in interstate commerce, writings, signs, signals, pictures and sounds for the purpose of executing the scheme and artifice to obtain money from Carolina Insulation to which they were not entitled, in violation of Title 18, United States Code, Section 1343.

*Object of the Conspiracy*

6. The object of the conspiracy was for the Defendant **MARGARET WARD HEILMAN** and others, known and unknown to the United States Attorney, to obtain money and property from Carolina Insulation to which **MARGARET WARD HEILMAN** and others, known and unknown to the United States Attorney, would not have otherwise been entitled.

*Manner and Means of the Conspiracy*

7. The manner and means by which **MARGARET WARD HEILMAN** and others, known and unknown to the United States Attorney, sought to accomplish the object of the conspiracy include the following:

- a. Margaret Ward Heilman worked for Carolina Insulation for over 25 years, and she served as the bookkeeper for Carolina Insulation.
- b. As the bookkeeper, she was listed on Carolina Insulation's bank account(s) and had signatory authority.
- c. As part of the conspiracy, **MARGARET WARD HEILMAN** wrote checks to herself for personal expenses when needed. Further, **MARGARET**

**WARD HEILMAN** wrote checks and/or made purchases for personal, non-business related expenses, for known and unknown conspirators.

- d. Further, as part of the conspiracy, a known coconspirator would ask **MARGARET WARD HEILMAN**, for money for personal expenses when she needed it.
- e. Since **MARGARET WARD HEILMAN** had access to Carolina Insulations checks and bank accounts, she wrote check(s) from Carolina Insulation's bank account(s) when she chose to and/or when requested by known and unknown conspirators.
- f. **MARGARET WARD HEILMAN** made the checks written to herself and other known and unknown conspirators look like legitimate business expenses on Carolina Insulation's ledger by representing the check was a legitimate business expense; for example, a "men's travel expense." When, in fact, for example, the check was written to herself and/or a known or unknown coconspirator, which was not legitimate business expense(s).

All in violation of Title 18, United States Code, Section 1349.

**FORFEITURE**

**CONSPIRACY:**

Upon conviction to violate Title 18, United States Code, Section 1349 (conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1343) as charged in this Information, the Defendant **MARGARET WARD HEILMAN** shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendants obtained directly or indirectly as a result of such offense.

**PROPERTY:**

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

A. **Proceeds/Forfeiture Judgment:**

A sum of money equal to all proceeds the Defendants obtained directly or indirectly as the result of the offense charged in this Information, that is, a minimum of \$1,500,000.00 and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to their violation of 18 U.S.C. § 1349.

B. **Vehicles:**

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- (1) 2021 Ford F150  
VIN: 1FTFW1CD9MFB84497  
Titled in the names of: Scott Heilman and Margaret Heilman

C. **Lawn Mower:**

2022 John Deere Lawn Mower  
VIN: 1GX5EFPM013174  
Titled in the name of: Margaret Heilman

D. Cash/United States Currency:

\$28,255.00 in United States Currency  
Seized from: The residence of Margaret Heilman

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendant up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A), and Title 28, United States Code, Section 2461(c).

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

By: **AMY BOWER** Digitally signed by AMY BOWER  
Date: 2024.04.03 13:50:30 -04'00'

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